



Gregory E. Ostfeld
Tel 312.456.8400
ostfeldg@gtlaw.com

April 12, 2022

VIA ECF

The Honorable Robert B. Kugler
United States District Court Judge
District of New Jersey
Mitchell H. Cohen Building & U.S. Courthouse
4th & Cooper Streets, Room 1050
Camden, NJ 08101

**Re: *In re Valsartan, Losartan, and Irbesartan Products Liability
Litigation*, Case No. 1:19-md-02875-RBK**

Dear Judge Kugler:

Pursuant to Revised Case Management Order No. 22 [ECF No. 726], as modified by Special Master Order No. 2 [ECF No. 843], Case Management Order No. 23 [ECF No. 863], Case Management Order No. 24 [ECF No. 1930], and the Court's ruling on the record at the March 30, 2022 Case Management Conference, on behalf of the Defendants' Executive Committee, various Defendants will be submitting the following memoranda today in opposition to Plaintiffs' Motion for Class Certification of Consumer, Third Party Payor, and Medical Monitoring Claims [ECF No. 1747]:

- Defendants' Memorandum of Law in Opposition to Plaintiffs' Motion for Class Certification of Consumer Economic Loss Claims;
- Defendants' Opposition to Plaintiffs' Motion for Class Certification of Third-Party Payor Claims;

Greenberg Traurig, LLP | Attorneys at Law

77 West Wacker Drive | Suite 3100 | Chicago, Illinois 60601 | T +1 312.456.8400 | F +1 312.456.8435

Albany. Amsterdam. Atlanta. Austin. Berlin. Boston. Chicago. Dallas. Delaware. Denver. Fort Lauderdale. Houston. Las Vegas. London.[†] Los Angeles. Mexico City.[†] Miami. Milan.[‡] Minneapolis. New Jersey. New York. Northern Virginia. Orange County. Orlando. Philadelphia. Phoenix. Sacramento. Salt Lake City. San Francisco. Seoul.[∞] Shanghai. Silicon Valley. Tallahassee. Tampa. Tel Aviv.[^] Tokyo.^ˆ Warsaw. Washington, D.C. West Palm Beach. Westchester County.

Operates as: [†]Greenberg Traurig Germany, LLP; [‡]A separate UK registered legal entity; ^ˆGreenberg Traurig, S.C.; ^ˆGreenberg Traurig Santa Maria; [∞]Greenberg Traurig LLP Foreign Legal Consultant Office; [^]A branch of Greenberg Traurig, P.A., Florida, USA; ^ˆGT Tokyo Horitsu Jimusho and Greenberg Traurig Gaiokuhajimubegoshi Jimusho; ^ˆGreenberg Traurig Grzesiak sp.k.

April 12, 2022
Page 2

-
- Defendants' Memorandum of Law in Opposition To Medical Monitoring Plaintiffs' Motion for Class Certification; and
 - Opposition of Wholesaler Defendants to Plaintiffs' Motion for Class Certification of the Consumer and Third-Party Payor Economic Loss Claims (collectively, "Defendants' Class Certification Opposition Briefs").

Defendants' Class Certification Opposition Briefs are being filed in accordance with the Court's directive at the September 29, 2021 Case Management Conference regarding length, as modified on the record at the December 15, 2021 Biweekly Teleconference.

Defendants' Class Certification Opposition Briefs are being submitted with various appendices. The appendices supporting individual briefs shall be attached to and filed with those briefs on ECF. Defendants' Class Certification Opposition Briefs also refer to a set of common exhibits. The common exhibits (or slipsheets for confidential documents, where appropriate) shall be filed on ECF as attachments to the attorney certification attesting to the content of the common exhibits.

Due to the confidentiality of certain information included in the Defendants' Class Certification Opposition Briefs and supporting materials, in accordance with the Amended Confidentiality and Protective Order entered in this litigation [ECF No. 1661], documents containing confidential information will be filed as slipsheets on ECF, and reports and transcripts filed on the docket shall be redacted consistent with the parties' respective confidentiality designations. Defendants' Class Certification Opposition Briefs will also be filed on ECF with redactions to the extent that they reference confidential information. Defendants will provide the Court with unredacted electronic and hard copies of these materials to be delivered via courier. Unredacted electronic copies will be served on Plaintiffs' liaison and leadership counsel for distribution.

Respectfully submitted,

/s/ Gregory E. Ostfeld
Gregory E. Ostfeld

cc: All counsel of record (via ECF)

CERTIFICATE OF SERVICE

I, Gerond J. Lawrence, an attorney, hereby certify that on April 12, 2022, I caused the foregoing to be filed electronically with the Clerk of Court to be served by operation of the Court's ECF system upon all counsel of record.

/s/ Gerond J. Lawrence
Gerond J. Lawrence
Greenberg Traurig, LLP